

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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<b>In re</b>	<b>: Chapter 9</b>
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<b>CITY OF DETROIT, MICHIGAN,</b>	<b>: Case No. 13-53846</b>
	:
<b>Debtor.</b>	<b>: Hon. Steven W. Rhodes</b>
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**NOTICE OF VIDEOTAPED DEPOSITION AND  
DOCUMENT REQUEST OF KENNETH A. BUCKFIRE**

**PLEASE TAKE NOTICE** that pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, made applicable to this proceeding by Federal Rules of Bankruptcy Procedure 7026 and 7030, the parties set forth in Exhibit 1 (the “Deposing Parties”), attached hereto, by and through their attorneys of record, will take the deposition of Kenneth A. Buckfire. The deposition shall be upon oral examination before an officer authorized by law to administer oaths, and will take place on July 15 and 16, 2014, at The Westin Book Cadillac, 1114 Washington Blvd., Conference Room: Book Boardroom, Detroit, Michigan 48226 at 9:00 a.m., and shall continue day to day until completed or adjourned. The testimony at the deposition will be recorded by stenographic and videographic means for the purpose of discovery, for use in the above-titled action, and for any other purpose permitted under the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure.

It is the Deposing Parties’ understanding from communications with counsel for the City that not all of Miller Buckfire’s “hard copy” files were collected, searched, and produced in

response to the various document requests propounded on the City<sup>1</sup>, including Miller Buckfire. Therefore, the Deposing Parties also request that Mr. Buckfire produce, or cause to be produced, whether by the City or otherwise, at least ten (10) days before his scheduled deposition, any and all Documents, whether in electronic or “hard copy” form, that the City failed to produce in any prior production in response to the following document requests:

1. EEPK, FMS, Wilmington Trust, and FGIC’s First Request for Production of Documents to the City of Detroit in Connection with the Plan for the Adjustment of Debts of the City of Detroit [ECF No. 4006], filed on April 11, 2014.
2. Syncora Capital Assurance Inc. and Syncora Guarantee Inc.’s First Request for the Production of Documents to the City of Detroit [ECF No. 3314], filed on March 28, 2014.
3. DWSD Discovery Parties’ First Set of Joint Requests for the Production of Documents to Debtor the City of Detroit, Michigan [ECF No. 4041], filed on April 11, 2014.
4. Water and Sewer Trustee and Ad Hoc Bondholder Committee’s First Request for Production of Documents to Debtor [ECF No. 3766], filed on April 3, 2014.
5. Water and Sewer Trustee and Ad Hoc Bondholder Committee’s Second Request for Production of Documents to Debtor [ECF No. 3916], filed on April 8, 2014.

These Documents shall be produced in the same form as those that have already been produced by the City.

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<sup>1</sup> Capitalized terms not defined herein shall be ascribed the meanings given to them in the Requests.

Dated: June 19, 2014

/s/ Mark R. James

Ernest J. Essad Jr.

Mark R. James

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**EXHIBIT 1**

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### **CERTIFICATE OF SERVICE**

I hereby certify that on June 19, 2014 the *Notice of Videotaped Deposition and Document Request of Kenneth A. Buckfire* was filed and served via the Court's electronic case filing and noticing system to all registered users that have appeared in the main Chapter 9 proceeding.

/s/ Mark R. James

Mark R. James

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